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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Amendment of the Commission's Rules
to Establish New Personal Communications
Services, Narrowband PCS

Implementation of Section 309(j) of the
Communications Act - Competitive Bidding
Narrowband PCS

)
)
) Gen Docket No. 90-314
) ET Docket No. 92-100
)
)
) PP Docket No. 93-253
)

TO: The Commission

REPLY COMMENTS OF AMERITECH MOBILE SERVICES, INC.
ON THE FURTHER NOTICE OF PROPOSED RULEMAKING

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SUMMARY

Ameritech Mobile Services, Inc. (Ameritech) is submitting its reply to the comments received by the Commission concerning narrowband Personal Communications Services (PCS) in its April 23, 1997 Report and Order and Further Notice of Proposed Rulemaking ("Further Notice"). First, in the Further Notice, the Commission proposed to eliminate MTA- and BTA- sized licenses. The record supports retaining MTA licenses; and Ameritech agrees with various commenters that BTA-sized areas are large enough to provide a viable service area, and are helpful in ensuring small business participation. Because narrowband PCS is a new technology, and its public demand cannot be accurately gauged at this time, it is too early to require that narrowband PCS be a regional or nationwide service. Moreover, the creation of additional regional or nationwide licenses will devalue existing licenses by flooding the market with new spectrum before the public has accepted narrowband PCS services. Finally, a change in the license sizes at this point would undermine investors' reliance on the Commission's auction rules and allocation of spectrum, and thus will make it difficult for businesses to raise capital in order to compete in the provision of narrowband PCS services.

Second, the Further Notice proposed eliminating or relaxing the construction requirements, or adopting a "substantial service" alternative. The record supports a relaxation of construction requirements because narrowband PCS providers have faced severe technological and equipment delays. These delays, and the slow development of public demand for narrowband PCS, support the conclusion that the construction requirements should not be made stricter. Additionally, relaxed requirements will allow market demand to

determine where and how quickly service should be provided. Thus, Ameritech has advocated a modified "substantial service" alternative which will help prevent spectrum warehousing, promote provision of service, and eliminate the vague wording of the current "substantial service" standard.

Third, the comments in this proceeding clearly indicate that release of the reserve narrowband PCS spectrum at this time would be premature because market acceptance of the service is not yet known, and the creation of additional competitors would devalue existing licenses. Ameritech agrees with the Personal Communications Industry Association (PCIA) and others that a study of market demand is needed before releasing more spectrum. For the same reasons, the auction of the paging response channels should also be separate and should also be delayed until public demand for narrowband PCS can be evaluated more accurately, and existing paging carriers can plan according to the spectrum needs of their service markets. In this regard, Ameritech opposes the elimination of eligibility requirements for the response channels. Allowing any narrowband licensee to obtain response channels encourages speculators to bid on them, thus making it difficult for incumbent paging licensees (who are capable of using the spectrum most efficiently) to convert their existing operations into two-way paging systems.

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To: The Commission

**REPLY COMMENTS OF
AMERITECH MOBILE SERVICES, INC.**

Ameritech Mobile Services, Inc. (Ameritech) hereby submits its reply to the comments received by the Commission concerning narrowband Personal Communications Services (PCS) in its April 23, 1997 Report and Order and Further Notice of Proposed Rulemaking ("Further Notice"). As discussed below, the record in this proceeding supports Ameritech's showing that Commission should (1) retain MTA- and BTA-sized geographic licenses; (2) relax construction requirements and adopt a modified "substantial service" standard; (3) delay the channelization and auction of the reserve narrowband PCS spectrum; and (4) retain the eligibility requirements for the unpaired response channels. Also,

Ameritech supports the proposal of Rural Telecommunications Group (RTG) to allow parties to a partitioning to decide among themselves how to split the license costs. Finally, Ameritech supports the recommendation of American Paging, Inc. (API), PageMart, Inc. (PageMart) and Personal Communications Industry Association (PCIA) that a study of market demand of narrowband PCS should be conducted before releasing more spectrum.

I. The Commission Should Retain MTA And BTA-sized Licenses.

Nearly all commenters have agreed with Ameritech that the current allocation of Major Trading Area (MTA) licenses should not be discarded.¹ However, opinion is sharply divided on whether Basic Trading Area (BTA) licenses should be retained. In this regard, Ameritech agrees with RTG and Merlin Telecom, Inc. (Merlin) that BTA-sized areas are large enough to provide a viable service area, and that elimination of BTA-sized areas will stifle designated entity participation.² Several of the commenters argue that BTA-sized licenses should be eliminated because they are too small to provide a viable service area, and because they are not necessary to ensure small business participation.³ Ameritech can understand their concerns. However, the Commission has already licensed 16 nationwide

¹ See AirTouch Paging (AirTouch) Comments at 10; API Comments at 3-4; Benbow PCS Ventures (Benbow) Comments at 4; Celpage, Inc. (Celpage) Comments at 6; CONXUS Communications, Inc. (CONXUS) Comments at 5-9; Merlin Telecom, Inc. (Merlin) Comments at 3-4; Metrocall, Inc. (Metrocall) Comments at 4; Morgan Stanley Partnerships Comments at 3; PageMart Comments at 2; Paging Network, Inc. (PageNet) Comments at 16; PCIA Comments at 2; RTG Comments at 9.

² RTG Comments at 7,8; Merlin Comments at 3-4.

³ See, e.g., API Comments at 3; Arch Communications Groups (Arch) Comments at 8; Benbow Comments at 3; Celpage Comments at 5; Metrocall Comments at 4; PageMart Comments at 2; PageNet Comments at 16-17; PCIA Comments at 3.

and/or regional service providers. Smaller license areas are needed to serve as "building blocks," allowing regional licensees to tailor their service areas as appropriate to their business plans and marketplace demand. Moreover, it is too early to mandate that narrowband PCS be a regional or nationwide service. In the future, narrowband PCS may evolve towards regional coverage, just as conventional paging has moved in that direction. However, at the present time, it is simply not known how narrowband PCS will unfold. There may be demand for niche services that do not require massive coverage areas. Also, the elimination of BTA-sized licenses will in fact make it harder for small businesses to obtain a license as larger licenses are more costly. Assuming a small business can muster the financial resources to purchase the license for a nationwide or regional system, it must still pay the substantial build out costs. Moreover, the small business may be forced to pay for a large amount of unwanted territory, where the cost of the buildout becomes even more onerous due to low population density. Ameritech agrees with Merlin that BTA-sized licenses allow smaller businesses the opportunity for more creative uses of spectrum, in response to the needs of their specific target markets.⁴

An equally important reason the Commission should refrain from eliminating BTA- and MTA-sized licenses is that the creation of more regional and nationwide licenses will devalue existing licenses. As discussed below in greater detail, the record in this proceeding dictates that the Commission consider the economical and competitive results of such drastic reconfigurations, which supporters of the proposed reconfiguration neglect.⁵ Carriers who

⁴ Merlin Comments at 3.

⁵ See, e.g., Arch Comments at 7-9.

are struggling to bring service to the public will be stymied by new competitors before the demand for this service is evaluated and determined. This will result in loss of value in the licenses of these already existing licensees; and may lead to licensees being unable to pay for their licenses, as the Commission is now seeing with broadband PCS licensees. The Commission should avoid a repeat of this problem by not flooding the market with new spectrum before the public has accepted narrowband PCS in the marketplace.

Further, businesses relied on the Commission's auction rules and the current allocation of spectrum in their technical and financial planning. As CONXUS and other commenters note, a channelization change midstream would undermine this reliance.⁶ It will hurt the businesses (particularly smaller ones) attempting to provide this service,⁷ and will make it more difficult for businesses to obtain capital from investors if the Commission's regulatory scheme is viewed as an unstable one that could change after the auction has ended. In order to protect narrowband PCS from a reputation as a "high risk" investment before the industry has even gotten off the ground, the Commission should not reconfigure the remaining narrowband PCS channels for licensing by larger geographic areas.

In this regard, Ameritech supports the proposal of PCIA and others that a study of narrowband PCS market demand should be conducted before the Commission releases more spectrum.⁸ This study will allow the Commission to evaluate the public's acceptance of

⁶ CONXUS Comments at 5-6; AirTouch Paging (AirTouch) Comments at 3,5; Celpage Comments at 6; Merlin Comments at 3-4; Morgan Stanley Partnership Comments at 3-6; RTG Comments at 8-9.

⁷ Metrocall Comments at 5; PageMart Comments at 2.

⁸ API Comments at 2-3; PageMart Comments at 4-6; PCIA Comments at 8-11.

narrowband PCS, and to develop rules and policies accordingly. Such approach will ensure that future allocations are supported by market demand, and will promote stability in the rulemaking process, thus strengthening and encouraging reliance on Commission rules by investors and businesses. Channelization and licensing decisions made without the benefit of such study may be inappropriate, and may hamper the Commission's goals of making services available to the public, and promoting competition in the narrowband PCS industry.

II. The Commission Should Relax Construction Requirements, And/Or Adopt A Modified "Substantial Service" Alternative.

The record in this proceeding makes it clear that relaxation of construction requirements is essential to give narrowband PCS providers relief from onerous build-out costs before demand for narrowband PCS services has fully developed.⁹ Narrowband PCS is still a new technology, and public acceptance of this service cannot be accurately projected at this time. A relaxation of construction requirements will give PCS providers more flexibility to respond to market demand, rather than pouring resources into construction of an expensive system where there may be no immediate demand for service. A relaxation will thus allow the marketplace to dictate where and how quickly service should be provided.

Commenters have expressed concern that any relaxation of the construction requirements should be designed to prevent spectrum warehousing by licensees who are not providing service in a reasonable time, because they are waiting for the market value of their

⁹ See Comments of Ameritech at 2-5; Arch at 17-19; Benbow at 14-15; Celpage at 10; CONXUS Comments at 13-14; Metrocall Comments at 8; PCIA Comments at 13.

spectrum to increase over what they paid for it at the auction.¹⁰ One such commenter admitted, however, that warehousing is not a significant threat where licensees have paid great sums of money for their licenses.¹¹ Several commenters suggest that they would favor a "substantial service" alternative if it were modified in order to prevent spectrum warehousing and eliminate the vagueness of the current wording.¹² Ameritech advocates a modified "substantial service" option which addresses both concerns. This option would provide a clearer guideline for licensees, while affording maximum flexibility in the services which can be offered. It would also prevent spectrum warehousing and encourage implementation of service. As described in its Comments, Ameritech proposes that the definition of "substantial service" be modified as follows:

Substantial service is a service that is sound, favorable, and reasonably capable of meeting an appropriate portion of the public demand for one or more of the communication services of which the system is capable under the Commission's rules.¹³

The above definition addresses warehousing concerns by making it clear that service to the public must be provided. Ameritech has included the requirement to meet "an appropriate portion" of the public demand for the new services, to reflect that each

¹⁰ Arch Comments at 17; Benbow Comments at 13-14; Celpage Comments at 10-11; CONXUS Comments at 11-13; Merlin Comments at 7; Metrocall Comments at 8-9; PageMart Comments at 6-7; PageNet Comments at 12-13; PCIA Comments at 14; RTG Comments at 12-15.

¹¹ Celpage Comments at 11.

¹² See e.g., Celpage Comments at 11; Metrocall, Inc. (Metrocall) Comments at 8-9; PageMart Comments at 7.

¹³ Ameritech Comments at 4.

narrowband licensee will be one of 16 service providers, and therefore should not have to spend resources on building a system that will meet the entire public demand.

Commenters addressing the issue agree that in no case should the Commission make the buildout requirements stricter.¹⁴ In addition to an uncertain market demand at this time for their services, narrowband PCS providers face severe equipment and technological delays in their efforts to construct systems and begin service. RTG incorrectly suggests that narrowband PCS licensees face no "unique circumstances" (i.e., lack of equipment to build systems) which would warrant flexibility in construction requirements.¹⁵ As Arch and other commenters note, equipment and technological delays have plagued the industry,¹⁶ and only two licensees of the 40 PCS licenses awarded by the Commission by auction, have been able to begin commercial operation. A relaxation of the construction requirements is thus supported by these well-documented delays, the severity of which may have been unforeseen by the Commission at the time the construction requirements were imposed. In short, a relaxation of construction requirements is necessary, at least until the market demand for narrowband PCS is better known, and until development and availability of equipment no longer pose a hindrance in commencing service.

¹⁴ See Arch Communications at 17-19; Benbow Comments at 15; Celpage Comments at 10; Metrocall Comments at 8.

¹⁵ RTG Comments 14-15.

¹⁶ Arch Comments at 18; Benbow PCS Ventures (Benbow) Comments at 14-15; ComTech Communications, Inc. (ComTech) Comments at 9-10; CONXUS Communications, Inc. (CONXUS) Comments at 13-14; PCIA Comments at 4, 15.

III. The Commission Should Delay The Auction Of The Reserve Narrowband PCS Spectrum, And Should Have A Separate Auction For The Response Channels.

Wisely, nearly all of the commenters in this proceeding agree that the Commission should not yet license the reserve narrowband spectrum, due to lack of public demand and the harmful impact on the value of existing licenses.¹⁷ Only two commenters, RTG and Merlin, support an auction of this spectrum at the present time. Merlin's motivation for this proposal would appear to be that, as a consulting firm, it wishes to make available the greatest amount of spectrum possible to its clients who wish to obtain narrowband PCS licenses.¹⁸ It is respectfully submitted that the auction of the MTA and BTA licenses already allocated will afford Merlin's clients ample opportunities to become narrowband PCS licensees. However, the record (and more importantly, the Commission's recent experience in broadband PCS) make it abundantly clear that the market should not be flooded with narrowband PCS spectrum. As documented by Ameritech and numerous other commenters, auctioning the reserve band would only devalue existing licenses, making it more difficult for the licensees to obtain capital needed for their buildout. The public interest suffers under such circumstances. RTG's only motivation seems to be that it prefers that the FCC hold only one auction for all remaining narrowband spectrum instead of several, in order to minimize overhead costs.¹⁹ Ameritech respectfully submits that this reason does not justify

¹⁷ See AirTouch Comments at 14-15; API Comments at 2; Arch Comments at 9-10; Benbow Comments at 5-8; Celpage Comments at 7-9; CONXUS Comments at 15-17; Metrocall Comments at 6-7; Morgan Stanley Partnership Comments at 3; Motorola, Inc. (Motorola) Comments at 7; PageMart Comments at 4-6; PageNet Comments at 3; PCIA Comments at 8.

¹⁸ See Merlin Comments at 2.

¹⁹ RTG Comments at 20-21.

the harm to the public interest as explained above. This conclusion is supported by Morgan Stanley Partnerships (the only commenter with expertise in financial matters), which states that an auction at this time would devalue all existing licenses by creating additional competitors before market demand is known.²⁰

Merlin and three other commenters advocate an auction of the remaining MTA channels (including the response channels) as soon as possible, in order allow bidders to pursue back up strategies, to benefit from the interdependencies of the licenses, and to minimize the administrative and financial costs associated with auction participation.²¹

Ameritech does not oppose an MTA auction, although concerns over the impact on existing license values may cause the Commission to consider a short delay until at least a few more existing licensees can commence service to the public. However, the auction of the paging response channels should be delayed until public demand for narrowband PCS can be evaluated more accurately, and existing paging carriers can plan accordingly.

In this regard, demand for one-way paging remains strong,²² and there is no documentation of a need to dismantle existing paging services for the sake of introducing

²⁰ Morgan Stanley Partnerships Comments at 4-6.

²¹ Merlin Comments at 8-9 (favoring one auction as soon as possible which includes reserve spectrum, response channels, and remaining MTA licenses); API Comments at 5 (postpone release of reserve spectrum but auction off remaining MTA licenses as soon as possible); Arch Comments at 9-11 (opposing release of reserve spectrum but favoring one auction for MTA licenses and response channels for administrative costs reasons); RTG at 20-21 (administrative costs justify auction of reserve and remaining MTA licenses as soon as possible, with response channels in the same auction).

²² Ameritech's second quarter results for 1997 reflect a 38% annual increase in paging customers. See Ameritech Earnings Per Share Up 10.8 Percent to \$1.13 in Second Quarter; 15th Consecutive Quarter of Double Digit Growth, PRNewswire, July 15, 1997.

four more licensees vying with twenty seven other competitors for the presently undeveloped narrowband PCS market. A delayed, separate auction for the paging response channels, using a multiple round format, will help avoid the problem of overpayment by the winning bidder (i.e., the "winner's curse"), since bidders will not suffer from a lack of knowledge of market demand for narrowband PCS.

IV. The Commission Should Not Eliminate Eligibility Requirements For The Unpaired Response Channels.

Ameritech opposes Merlin's proposal to eliminate response channel eligibility restrictions, and Benbow's proposal to allow any narrowband licensee to apply for and obtain response channels as long as the applicant has the necessary geographic relationship to the licensed service area for which it is seeking the response channels.²³ Such an allowance would encourage speculators to bid on the response channels, thus making it difficult for incumbent paging licensees to convert their existing operations into two-way paging systems, particularly if response paging eventually gains wide public acceptance. Ameritech also agrees with Celpage and Metrocall that eliminating the eligibility requirements would be unfair to many in the paging industry who have bowed out of other auctions in reliance on obtaining a response channel; and that paging systems operators are capable of using the response channels in the most efficient manner.²⁴ Further, PCIA has raised an issue as to whether the use of the response channels as stand-alone frequencies could create interference problems, given the seven watt power set by the Commission in Section 24.132(a),(b) of the

²³ Benbow Comments at 12; Merlin Comments at 6.

²⁴ Celpage Comments at 12; Metrocall Comments at 9.

Commission's rules.²⁵ Thus, the Commission should retain the eligibility requirements for the unpaired response channels.²⁶

V. The Commission Should Allow Parties To A Partitioning To Decide Among Themselves How To Split The License Costs.

The record in this proceeding indicates support of the Commission's partitioning/disaggregation proposal.²⁷ In addition to supporting the Commission's partitioning/disaggregation proposal, Ameritech supports the proposal of RTG to allow parties to a partitioning to decide among themselves how to split the license costs.²⁸ Such an allowance will permit parties to partition less populated areas, which benefits potential buyers who do not want to or are unable to pay a per-pop license fee to the Commission that was based on large cities within the region. This allowance will also permit the market place to determine what services will be offered, and will provide parties with great flexibility.

²⁵ PCIA Comments at 12.

²⁶ Ameritech agrees with Celpage that it may be advantageous to license the response channels on an MTA basis, since most 900 MHz paging systems are wide-area in nature. See Celpage Comments at 7.

²⁷ See Celpage Comments at 13; CONXUS Comments at 17; Merlin Comments at 21; Metrocalt Comments at 10; RTG Comments at 21.

²⁸ Rural Telecommunications Comments at 22.

CONCLUSION

In conclusion, Ameritech respectfully requests that the Commission modify its narrowband PCS rules in light of the above statements.

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